

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	: <u>PROTECTIVE ORDER</u>
	:
-v.-	: 18 Cr. 413 (JSR)
	:
EDDIE COTTO,	:
	:
Defendant.	:
	:
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Upon the application of the United States of America, Audrey Strauss, United States Attorney for the Southern District of New York, by and through Assistant United States Attorneys Aline R. Flodr, Rebecca T. Dell, and Emily A. Johnson, of counsel, for an order precluding the dissemination of materials produced pursuant to 18 U.S.C. § 3500 and/or *Giglio v. United States*, 405 U.S. 150 (1972), and for good cause shown, and except as set forth in Protective Orders regarding Cooperator-1, Cooperator-2, and the CSs,

IT IS HEREBY ORDERED that counsel for defendant EDDIE COTTO must destroy or return to the Government all § 3500 and *Giglio* material and any copies thereof for all Government witnesses (the “3500 Material”) at the conclusion of the trial of this matter or when any appeal has become final.

IT IS FURTHER ORDERED THAT the defense is precluded from disseminating any of the 3500 Material and any copies thereof to anyone beyond the defendant, defense counsel, and any paralegal or staff employed by the defense, except: (1) during Court proceedings at trial, or (2) to show a Government witness a copy of his or her own 3500

Material, should the witness elect to meet with defense counsel before trial.

AGREED AND CONSENTED TO:

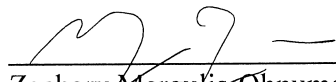
AUDREY STRAUSS  
United States Attorney

/s/ Rebecca T. Dell

By:

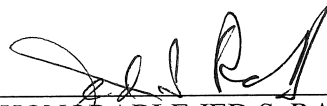
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Aline R. Flodr  
Rebecca T. Dell  
Emily A. Johnson  
Assistant United States Attorneys

Date: June 15, 2021

  
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Zachary Margulis-Ohnuma  
Victoria Medley  
Counsel for Defendant Eddie Cotto

Date: June 15, 2021

Dated: New York, New York  
June 16, 2021

  
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THE HONORABLE JED S. RAKOFF  
UNITED STATES DISTRICT JUDGE